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0 | *Attorneys for Defendant
Internet Referral Services, LLC*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

14 AXS GROUP LLC,
15 Plaintiff.

16 | v

17 INTERNET REFERRAL SERVICES,
18 LLC, EVENT TICKETS CENTER,
19 INC., VIRTUAL BARCODE
DISTRIBUTION LLC, ALTAN
TANRIVERDI, and
SECURE.TICKETS.

Defendants.

Case No. 2:24-CV-00377-SPG (Ex)

**STIPULATION TO EXTEND TIME
FOR DEFENDANT INTERNET
REFERRAL SERVICES, LLC TO
RESPOND TO FIRST AMENDED
COMPLAINT**

**FIRST AMENDED COMPLAINT
SERVED: MAY 6, 2024**

**CURRENT RESPONSE DATE:
JUNE 28, 2024**

NEW REONSE DATE: JULY 29, 2024

23 Plaintiff AXS Group LLC (“AXS” or “Plaintiff”) and Defendant Internet
24 Referral Services, LLC (“Referral Services”) stipulate and respectfully request that
25 the Court extend the deadline for Referral Services to answer or otherwise respond
26 to the First Amended Complaint by thirty days.

27 WHEREAS, on January 16, 2024, Plaintiff filed a Complaint in this action
28 against Referral Services and four other Defendants (ECF No. 1);

STIPULATION TO EXTEND TIME

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Case No. No. 2:24-CV-00377-SPG (Ex)

1 WHEREAS, on February 7, 2024, Plaintiff formally served Referral Services,
2 (ECF No. 24);

3 WHEREAS, the parties previously agreed to extend the deadline for Referral
4 Services to respond to the Complaint from February 28, 2024 to March 29, 2024
5 (ECF No. 26); from March 29, 2024 to April 29, 2024 (ECF No. 33); and then from
6 April 29, 2024 to May 29, 2024 (ECF No. 47);

7 WHEREAS, on May 6, 2024, Plaintiff filed its First Amended Complaint
8 (ECF No. 39);

9 WHEREAS, on May 31, 2024, the Court granted the parties' stipulation to
10 extend the deadline for Referral Services to respond to the First Amended Complaint
11 from May 29, 2024 to June 28, 2024 (ECF No. 50);

12 WHEREAS, the parties have been engaging in discussions to explore a
13 possible resolution of this matter;

14 WHEREAS, having additional time to engage in further discussions will be
15 beneficial to the potential for early resolution;

16 WHEREAS, AXS and Referral Services agree to a thirty (30) day extension
17 of time to Referral Services' deadline to answer or respond to the First Amended
18 Complaint so they can continue discussing a resolution to this matter;

19 THEREFORE, AXS and Referral Services stipulate to a thirty (30) day
20 extension of time, making Referral Services' answer or response to the First
21 Amended Complaint due on July 29, 2024.

22 It is so stipulated.

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28

1 Dated: June 25, 2024

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3 DORSEY & WHITNEY LLP

4
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22 *Attorneys for Plaintiff AXS Group LLC*

23 Dated: June 25, 2024

24 BAKER BOTTS LLP

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29 *Attorneys for Defendant Internet Referral
30 Services*

31 **FILER'S ATTESTATION**

32 Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filing party hereby attests that all
33 signatories listed, and on whose behalf the filing is submitted, concur in this filing's
34 content and have authorized this filing.

35 /s/ Cheryl A. Cauley
36 Cheryl A. Cauley